

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

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WILLIAM E. UNDERLAND and MARK
SCHALLER, on Behalf of Themselves and All
Others Similarly Situated,

Electronically Filed

Plaintiff,

- against-

DENNIS ALTER, WILLIAM A. ROSOFF,
PHILIP M. BROWNE, DAVID B.
WEINSTOCK, MAX BOTEL, THOMAS
COSTELLO, DANA BECKER DUNN,
ROBERT LUBNER, OLAF OLAFSSON,
MICHAEL STOLPER, and KPMG LLP,

10-Civ.-3621 (CMR)

Defendants.

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**DECLARATION OF THOMAS L. LAUGHLIN IV IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION, TO APPOINT CLASS
REPRESENTATIVES, AND TO APPOINT CLASS COUNSEL**

I, Thomas L. Laughlin IV, declare as follows:

1. I am an attorney with Scott+Scott, Attorneys at Law, LLP, counsel for Lead Plaintiffs in this matter. I make this declaration in support of Lead Plaintiffs William E. Underland's and Mark Schaller's Motion for Class Certification, to Appoint Class Representatives, and to Appoint Class Counsel.

2. I declare that attached to this declaration are true and correct copies of the following exhibits obtained from reliable sources:

Exhibit A: Advanta Corporation's Petition for Voluntary Bankruptcy, dated November 8, 2009, and exhibits thereto;

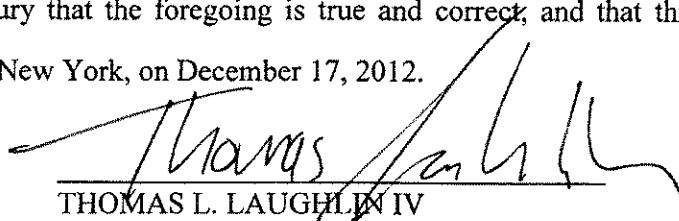
Exhibit B: A copy of a decision, dated February 22, 2010, from the case *New York University v. Ariel Fund Limited, et. al.*, No. 603803/08 (N.Y. Sup. Ct.);

Exhibit C: Scott+Scott, Attorneys at Law, LLP's firm résumé;

Exhibit D: The Weiser Law Firm's résumé; and

Exhibit E: A proposed order granting the relief requested by Lead Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed at New York, New York, on December 17, 2012.



THOMAS L. LAUGHLIN IV